

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DEREK SCOTT WILLIAMS PLLC and
DEREK SCOTT WILLIAMS REAL ESTATE
LLC, on behalf
of themselves and all others similarly situated,

Plaintiffs,

v.

THE CINCINNATI INSURANCE
COMPANY,

Defendant.

Case No. 20 C 2806

JOINT STATUS REPORT

Plaintiffs Derek Scott Williams, PLLC and Derek Scott Williams Real Estate, LLC and Defendant The Cincinnati Insurance Company, pursuant to the Court's Order of February 28, 2021 (Dkt. #72), hereby submit this Joint Status Report containing a proposed discovery plan and pretrial litigation schedule.

In accordance with the Court's Order, the parties met and conferred about pretrial scheduling on March 4, 2021 and have agreed to the following proposed discovery and pretrial schedule.

Event	Proposed Deadline
Fact Discovery Opens	March 5, 2021
Plaintiffs' Lead Counsel Submission	March 19, 2021
Defendants' Answer to Remaining Claims	March 22, 2021
Deadline to Amend Pleadings or Join Additional Parties	June 30, 2021

Plaintiffs' Rule 26(a)(2) class certification disclosures	August 6, 2021
Plaintiffs' Motion for Class Certification	August 6, 2021
Defendants' Rule 26(a)(2) class certification disclosures	September 20, 2021
Defendants' Opposition to Class Certification	October 25, 2021
Plaintiffs' Reply In Support of Class Certification	December 21, 2021

The parties propose conferring and submitting to the Court a proposal regarding subsequent deadlines promptly after the Court rules on Plaintiffs' Motion for Class Certification.

Dated: March 4, 2021

Respectfully submitted,

By: /s/ Michael D. Monico

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AFFIDAVIT OF SERVICE

Barry A. Spevack, an attorney, states that all parties were served on March 4, 2021 through the Court's ECF Filing System.

/s/ Barry A. Spevack